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Attorneys for Nominal Defendant Freddie Mac

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

R.S. BASSMAN, Derivatively on Behalf of FREDDIE MAC a/k/a Federal Home Loan Mortgage Corporation and its shareholders,

Plaintiff,

V.

Case No. 08 CV 02423-BSJ

RICHARD F. SYRON, PATRICIA L. COOK,
ANTHONY S. PISZEL, EUGENE M. McQUADE,
RICHARD KARL GOELTZ, STEPHEN A. ROSS,
SHAUN F. O'MALLEY, ROBERT R. GLAUBER,
BARBARA T. ALEXANDER, WILLIAM M. LEWIS,
JR., JEFFREY M. PEEK, GEOFFREY T. BOISI,
RONALD F. POE, WASHINGTON MUTUAL, INC.,
PRICEWATERHOUSECOOPERS, LLP, KERRY K.
KILLINGER, ANTHONY R. MERLO, JR., FIRST
AMERICAN CORPORATION, FIRST AMERICAN
EAPPRAISEIT, COUNTRYWIDE FINANCIAL
CORPORATION, COUNTRYWIDE HOME EQUITY
LOAN TRUST, COUNTRY-WIDE BANK, FSB,
COUNTRYWIDE HOME LOANS, INC.,
LANDSAFE, INC., and ANGELO R. MOZILO,

NOTICE OF MOTION TO TRANSFER OR STAY

Defendants,

and

FREDDIE MAC a/k/a Federal Home Loan Mortgage Corporation,

Nominal Defendant.

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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Steven Cole, dated June 13, 2008, and the Memorandum of Law in Support of Its Motion to Transfer Venue or, Alternatively, Stay the Proceedings, nominal defendant Freddie Mac will move this Court, before the Honorable Barbara S. Jones, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined by the Court, for an Order transferring this action to the United States District Court for the Eastern District of Virginia or, in the alternative, staying this action pending the outcome of the investigation of Plaintiff's allegations by a Special Litigation Committee, and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
June 16, 2008

BINGHAM McCUTCHEN LLP

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